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Town and Country Planning Act 1990:  
Appeal by Prudential Property Investments Ltd and Astral  
Developments Ltd

Development of Pyestock North (Hartland Park), Ively Road  
Farnborough, GU14 0PJ



## **Summary of Proof of Evidence: Air Quality**

on behalf of

SPLAT (Stop Pyestock bLot Act Today) Campaign Group

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Summary of Proof of Evidence Subject: Air Quality

## **Contents**

**1 Introduction**

**2 Policies that relate to Air Quality**

**3 Local Setting**

**4 Description of Development Proposal with respect to Air Quality**

**5 Omissions from the Air Quality Assessment**

**6 Additional Harm – Key Issues**

**7 Commentary on Statement of Common Ground – Air Quality**

**8 Key reasons for rejection regarding Air Quality**

## 1 Introduction

1.1 I have lived in the Pondtail area for some 25 years. I am an engineer with a mathematical background and an informal understanding of the physics of air movement; I am not an air quality expert and do not present myself as such.

1.2 SPLAT is concerned that the additional pollution of air during construction (6 years), and by operations on site, will cause an unacceptable impact on the quality of life and the health of local residents.

1.2.1 SPLAT is unable to reconcile the results of the air quality modelling conducted with the local knowledge.

1.2.2 The modelling is based on projections out to 2012 while the site is planned to become fully operational in 2016.

1.2.3. Significant aspects of the modelling are missing:-

- Queuing traffic and congestion on the M3 Motorway
- Queuing traffic on the Minley Link Road
- The model of the operational Pyestock site
- The impact of the operational site on the Pondtail conurbation

## 2 Policies that relate to Air Quality

2.1 PPS23 Para 5 – The precautionary principle should apply.

2.2 PPS23 Annex 1 Para 1.11 to 13 - Adjacency to Rushmoor's AQMA should apply.

2.3 POSTNOTE 272 – HGV park requires special consideration.

### 3 Local setting

There is a history of Pondtail's air being polluted by Pyestock. Pyestock sits over a valley which includes much of Pondtail where polluted air is known to pool. This pooling coincides with low wind speeds which occur over 50% of the year. This year Pondtail experienced bad air from Pyestock on five recorded occasions. It has been verified that Pyestock's air pollution only affects Pondtail. The notion that Pondtail is protected by the trees between the sites is false. Empirical evidence says so and the trees are not protected.

### 4 Description of proposal with respect to air quality.

While the ES studies conclude there would be no material harm resulting from the development, verification of the use of the AAQuIRRE model is not possible so this is not a rational conclusion in light of the long list of omissions from the assessment. Traffic on the M3 is already at capacity, Rushmoor have retained the AQMA because the NOx levels are high and yet only moving traffic has been modelled. Best advice is that the modelling has been done correctly NOT that it has been done in correct context. Pollutants considered are limited to PM10, PM25 and NOx.

### 5 Omissions from the air quality assessment.

Several aspects of the development are excluded from the assessment. It does not cover the impact of a fully operational site, the inevitable traffic stagnation, or the site itself during operation (contrary to NSCA guidance), and it does not reflect local experience.

The vehicle mix used is not available even in the March 2008 statistics (which were collected over the Easter holiday). The base load of HGV's and LGV's before development is not available.

The on site odour trial excluded local conurbations.

There is no model for Pondtail and the use of standard dispersion models which assume that tree cover between the sites will disperse the pollution sufficiently is false.

The traffic model also fails to cover full operation in 2016. It stops short at 2012.

The year-on-year traffic growth parameters are not justified and the input traffic data cannot be verified, modelling is limited to M3 J4A area, Minley Link Road, and Summit Avenue.

Both the 800 HGV and other vehicles limits are artificially low. HGV count excludes two axle trucks which can be as large as 36,000kg.

## 6 Additional Harm/The key issues

It is because polluted air is bad for the health that the statutory limits have been set. The purpose of these guidelines is to drive an improvement to air quality not to pollute right up to their limit and beyond. This appellant's assessment has been contrived to exclude sufficient of the material issues to obtain the answer they require.

## 7 Commentary on statement of common ground – Air Quality

The statement of common ground contains an equally incomplete set of information.

- The chosen methodology does not correlate with local experience of living with the site.

- The only pollutants considered are PM<sub>10</sub>, PM<sub>25</sub> and NO<sub>x</sub>. There is no evidence that CO, Hydrocarbons, and CO<sub>2</sub> have been considered.
- Taking 2011 as the opening year is wrong it should be 2016.
- Why use LHR met data when the Farnborough met station is nearby?
- We have no understanding of the make up of the base traffic load; two axle heavies are omitted from the analysis, and the traffic input is flawed. The March 2008 survey coincided with the Easter holiday period so is non representative. The claim that the model has been stretched to 4800 HGV movements/day needs justification. This would be a movement every 20 seconds - 24 hours a day. This is not a congestion free scenario and operational "bunching" must be included in the model. If the 2400 HGV's were to be evenly distributed throughout 24 hours there would be 100 HGV's on site in any one hour. The site is capable of handling 150 HGV's at one time – it will be a large truck park.
- At best all traffic data are contrived.
- An undertaking to "encourage" HGV operators to conform to the highest European standards, to "encourage" the use of alternate fuels and to "encourage" the use of work travel is not effective or enforceable mitigation.
- No one knows if the residual air quality impacts are acceptable because the modelling is incomplete and the traffic input is flawed.
- Analysis of sensitive locations has been done on the basis that existing tree cover will remain. They are not protected and the policy is to return the area to heath land. NO<sub>x</sub> levels in some sensitive areas are already well above the National Maximum.
- Impacts cannot be addressed appropriately in the light of the other delinquencies set out here.
- Only onsite odour assessment has been done. It must be conducted also for Pondtail.

## 8 Key reasons for rejection regarding air quality

This development in this area will by definition reduce the air quality. More trucks and cars make the air worse. All modelling is dependant upon accurate input information and this information is flawed. Modelling algorithms must be verified with the local experience of the location and this has not been done. STATS confirmed (spring of 2008) that traffic input data was impossible to establish. The ES addendum is misleading so is not a credible source of base traffic load information.

### 8.4 The key issues that form the basis for rejection are:-

In the Proof of Evidence – “Air Quality” we have identified numerous issues that must be modelled which have been omitted.

- There is a list of numerous conclusions in the Statement of Common Ground that are wrong.
- Site generated traffic is known to be understated.
- The appellant is modelling the wrong “out-year” – the site is fully operational in 2016 not 2012.
- There is no justification for the choice of the growth parameter of network traffic.
- The base flow onto which the development traffic is added has been shown here to be wrong.
- Modelling does not reasonably address increased congestion on the M3. The modelling takes a linear extrapolation of pollution based on the number of vehicles. It should be an exponential relationship as the queuing increases.
- The air quality impacts of on site operations have not been assessed.

- Assessment of air quality in Pondtail has not been done. The Appellant falsely seems to believe it is too far away and the intervening trees will disperse any effect. They do not and the trees are not protected.
- Modelling is disputed because of experience of historic operations on the site causing noise and odour in Pondtail.
- The proposal is to add a permanent bad neighbour to an existing infrequent one.

There are numerous deficiencies in the Air Quality assessment; so many that little reliance can be placed on its benign conclusions. The “precautionary principle” surely provides that it is unsafe to approve this development on the basis of the air quality modelling that has been done in terms of scope, accuracy of input data and the lack of surety over the way the tool has been applied.